

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LUIS FRANCISCO GONZALEZ COLON  
MARILYN RODRIGUEZ RIOS

DEBTOR(S)

CASE NO. 14-08398 BKT

CHAPTER 7

MOTION REQUESTING 341 MEETING BY INTERROGATORIES

TO THE HONORABLE COURT:

Comes debtor(s) represented by the undersigned attorney and most respectfully **EXPOSE(S)** and **PRAY(S)**:

1. Debtor(s) filed a bankruptcy case under Chapter 13 on October 10 ,2014. The case was converted to Chapter 7 on March 7, 2018.
2. The 341 Meeting of Creditors continuance is being scheduled for May 31 ,2018. Due to the passing of Hurricane María debtor(s) are not within the territory of Puerto Rico.
3. As a result of the foregoing, debtor(s) respectfully request from this Honorable Court, that the examination of debtor(s) be practiced via interrogatories.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the aforementioned and grant this motion.

**NOTICE:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

RESPECTFULLY SUBMITTED.

In Caguas, Puerto Rico, this 7<sup>th</sup> day of May 2018.

NOTICE: I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF System which will send notification of such filing to the parties registered in the CM/ECF System. All other parties have been notified by the United States Postal mailing service.

**/S/ JOSÉ Á. LEÓN LANDRAU**

JOSÉ Á. LEÓN LANDRAU (131506)  
Attorney for Debtor(s)  
PO Box 1687  
Caguas, Puerto Rico 00726  
Phone: 787-746-7979  
Fax : 787-961-9348

Label Matrix for local noticing  
0104-3  
Case 14-08398-BKT7  
District of Puerto Rico  
Old San Juan  
Mon May 7 13:15:31 AST 2018

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

AT&T  
PO BOX 15067  
SAN JUAN, PR 00902-8567

(p)BMW FINANCIAL SERVICES  
CUSTOMER SERVICE CENTER  
PO BOX 3608  
DUBLIN OH 43016-0306

Cavalry Investments, LLC  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595-1340

FIRST BANK  
CONSUMER SERVICE CENTER  
BANKRUPTCY DIVISION-(CODE 248)  
PO BOX 9146,SAN JUAN, PR 00908-0146

IRS  
INTERNAL REVENUE SERVICES  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

LA FAMILIA PAWN  
LA FAMILIA CAGUAS I  
CALLE LOPEZ FLORES NO 9  
CAGUAS PR 00725

LCDA JOSE V ELAZQUEZ GRAU  
PO BOX 251  
CAGUAS, PR 00726-0251

MARIBEL LABOY PADILLA  
MC 65 BOX 6481  
PATILLAS, PR 00723

BMW FINANCIAL SERVICES NA LLC  
ASCENSION CAPITAL GROUP INC  
PO BOX 201347  
ARLINGTON, TX 76006-1347

UNITED STATES TRUSTEE  
500 TANCA ST STE 301  
SAN JUAN, PR 00901-1922

BANKRUPTCY SERVICER FOR BMW  
FINANCIAL SERVICES NA LLC  
ASCENSION CAPITOL GROUP  
PO BOX 201347  
ARLINGTON TX 76006-1347

CITIBANK  
PO BOX 70301  
SAN JUAN, PR 00936-8301

EASTERN AMERICA INSURANCE CO  
PO BOX 9023862  
SAN JUAN PR 00902-3862

FIRST BANK  
PO BOX 9146  
SAN JUAN, PR 00908-0146

JULIA A PRIMERO MIRANDA  
PO BOX 192762  
SAN JUAN PR 00919 2762

LCDA DALIANA M RAMOS ROSADO  
VELAZQUEZ GRAU AND RUIZ FERNANDEZ  
PO BOX 9011  
CAGUAS, PR 00726-9011

LCDO PEDRO ORTIZ ALVAREZ LLC  
PO BOX 9009  
PONCE, PR 00732-9009

MR MANUEL ALVARADO  
PMB 289200 AVE RAFAEL CORDERO  
SUITE 140  
CAGUAS, PR 00725

FIRSTBANK PUERTO RICO  
PO BOX 9146  
SAN JUAN, PR 00908-0146

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BMW FINANCIAL SERVICES  
BMW OF NORTH AMERICA LLC  
300 CHESTNUT RIDGE ROAD  
WOODCLIFF LAKE, NJ 07677-7731

CRESKA CORPORATION  
PMB 92  
PO BOX 71325  
SAN JUAN, PR 00936-8425

EOS CCA  
PO BOX 981025  
BOSTON, MA 02298-1025

HACIENDA  
DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

JULIA ANNABEL PRIMERO MIRANDA  
LCDO EFRAIN GUZAM MOLLET  
EL VEDADO 471-A ALTOS AVE HOSTOS  
SAN JUAN, PR 00918

LCDA JOHANNY MARTINEZ BATISTA  
PO BOX 816  
BAYAMON, PR 00960-0816

LVNV Funding, LLC its successors and assigns  
assignee of Santander Financial  
Services, Inc.  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587  
MRT LAW OFFICES PSC  
PO BOX 7255  
CAGUAS, PR 00726-7255

MUNICIPIO AUTONOMO DE CAGUAS  
DEPARTAMENTO DE FINANZAS  
APARTADO 907  
CAGUAS, PR 00726-0907

Naviant Solutions, Inc. Department of Educat  
Loan Services  
P.O. Box 9635  
Wilkes-Barre, PA 18773-9635

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

SALLIE MAE  
DEPARTMENT OF EDUCATION LOAN  
PO BOX 9635  
WILKES- BARRE, PA 18773-9635

SANTANDER  
BANCO SANTANDER  
PO BOX 362589  
SAN JUAN, PR 00936-2589

SAUL TORRES RIVERA  
LCDO JAIME H BARCELO SOSA  
PO BOX 367546  
SAN JUAN, PR 00936-7546

SR EDWIN PAEZ HERNANDEZ  
LCDA DALIANA M RAMOS ROSADO  
PO BOX 9011  
CAGUAS PR 00726-9011

TOYOTA  
TOYOTA CREDIT DE PR CORP  
PO BOX 71410  
SAN JUAN, PR 00936-8510

Toyota Motor Credit Corporation  
c/o Becket and Lee LLP  
POB 3001  
Malvern PA 19355-0701

U. S. Department of Education  
c/o FedLoan Servicing  
P. O. Box 69184  
Harrisburg, PA 17106-9184

US DEPARTMENT OF EDUCATION  
CONSOLIDATION DEPARTMENT  
PO BOX 242800  
LOUISVILLE, KY 40224-2800

JOSE A LEON LANDRAU  
LEON LANDRAU LAW OFFICE  
PO BOX 1687  
CAGUAS, PR 00726-1687

JOSE RAMON CARRION MORALES  
CHAPTER 13 TRUSTEE  
PO BOX 9023884  
SAN JUAN, PR 00902-3884

LUIS FRANCISCO GONZALEZ COLON  
PMB 289200  
AVE RAFAEL CORDERO SUITE 140  
CAGUAS, PR 00725-4155

MARILYN RODRIGUEZ RIOS  
PMB 289200  
AVE RAFAEL CORDERO SUITE 140  
CAGUAS, PR 00725-4155

MONSITA LECAROS ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

NOREEN WISCOVITCH RENTAS  
PMB 136  
400 CALAF STREET  
SAN JUAN, PR 00918-1314

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Jefferson Capital Systems LLC  
PO Box 7999  
St Cloud, MN 56302-9617

BMW Financial Services NA, LLC  
P.O. Box 3608  
Dublin, OH 43016

(d)JEFFERSON CAPITAL SYSTEMS LLC  
PO Box 7999  
St Cloud MN 56302

PORTFOLIO RECOVERY ASSOCIATES LLC  
120 CORPORATE BLVD  
NORFOLK, VA 23502

(d)Portfolio Recovery Associates, LLC  
POB 12914  
Norfolk VA 23541

End of Label Matrix  
Mailable recipients 46  
Bypassed recipients 0  
Total 46